

RAYMOND & RAYMOND

Attorneys at Law

Herbert B. Raymond, Esq.

Jeffrey M. Raymond, Esq.

Kevin de Lyon, Esq.

7 Glenwood Avenue, 4th Fl., Ste. 408
East Orange, NJ 07017
Telephone (973) 675-5622
Facsimile (408) 519-6711

Email: herbertraymond@gmail.com
Website: www.bankruptcylaw123.com

June 24, 2022

Honorable Rosemary Gambardella, U.S.B.J.
U.S. Bankruptcy Court
50 Walnut St., 3rd Floor
Newark, NJ 07102

Re: Tamika Brown-Wesley, Debtor(s)
20-14769
Chapter 13
Proceeding: Midfirst Bank's Default Certification
Hearing Date: To Be Determined

Dear Judge Gambardella:

Please accept this letter in opposition to the above matter.

The certification of default is based on the fact that the debtor is \$5,026.65 behind with mortgage payments. This may be correct. However, my office has been unable to make contact with the debtor and the deadline to respond is today. It is nonetheless believed that debtor may be able to propose a cure of these arrears. If stay relief is granted, debtor faces a loss of her home.

For the foregoing reasons, I respectfully request that the court schedule a hearing on the matter with the intention for a more formal response to be filed in the interim.

Respectfully submitted,

/S/ HERBERT B. RAYMOND, ESQ.

HERBERT B. RAYMOND, ESQ.